



Federal Communications Commission
Enforcement Bureau
45 L Street, NE
Washington, DC 20554

October 21, 2021

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Joe Putegnat
PZ/Illum Telecommunication Telecommunication LLC
1950 W. Corporate Way
Anaheim, CA 92801
joe@g4tel.com

cc: prianand309@illumtelecommunication.com
prianand309@pztelecommunication.com

Re: Official Correspondence from the Federal Communications Commission

Dear Mr. Putegnat,

We have determined that PZ/Illum Telecommunication Telecommunication LLC (PZ/Illum) is apparently originating illegal robocall traffic on behalf of one or more of its clients. You should investigate and, if necessary, cease transmitting such traffic immediately and take steps to prevent your network from continuing to be a source of apparent illegal robocalls. As noted below, downstream voice service providers will be authorized to **block all of PZ/Illum's traffic** if you do not (1) take steps to "effectively mitigate illegal traffic within 48 hours," and (2) inform the Commission and the Traceback Consortium within fourteen (14) days of the date of this letter (November 5, 2021) of the steps you have taken to "implement effective measures" to prevent customers from using your network to make illegal calls.¹ Additionally, if you continue knowingly or negligently to originate illegal robocall campaigns after responding to this letter, **we may remove your certification from the Robocall Mitigation Database thereby requiring all intermediate providers and terminating voice service providers to cease accepting your traffic.**²

Basis for finding apparent violations. You are receiving this letter because our investigation revealed that PZ/Illum apparently originated multiple illegal robocall campaigns, as set forth in Attachment A. The Federal Communications Commission's Enforcement Bureau (Bureau) works closely with the USTelecom's Industry Traceback Group (Traceback Consortium), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.³ Between August 24, 2021 and October 15, 2021, Traceback Consortium investigated prerecorded voice message calls that

¹ See 47 CFR § 64.1200(k)(4).

² *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1903, para. 83 & 1904, para. 86 (2020); 47 CFR § 64.6305.

³ *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Doclet No. 20-22, Report and Order, DA 21-1047 (EB 2021) (*2021 Consortium Selection Order*). See also *Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act*, Pub. L. No. 116-105, 133 Stat. 3274, Sec. 13(d) (2019) (TRACED Act).

voice service providers using honeypots (i.e. unassigned numbers held by providers to detect illegal robocalls) and customers of YouMail had flagged as illegal robocalls made without consent.⁴ The Traceback Consortium conducted tracebacks and determined that PZ/Illum originated the calls. The Traceback Consortium previously notified you of these calls and provided you access to supporting data identifying each call, as indicated in Attachment A. Further, the numerous tracebacks to PZ/Illum as an originator indicate that you are apparently knowingly or negligently originating illegal robocall traffic. Under our rules (and as explained further below), providers that originate illegal robocall traffic face serious consequences, including blocking by downstream providers of all of the originating provider's traffic. To avoid such blocking, you must take corrective actions immediately.

Actions You Should Take Now. PZ/Illum should take the following steps to resolve this matter:

1. Promptly investigate the transmissions identified in Attachment A.
2. If necessary, “effectively mitigate” the identified unlawful traffic by determining the source of the traffic and preventing that source from continuing to originate such traffic.
3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.
4. Within 48 hours, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic. If you have evidence that the transmissions identified in Attachment A were legal calls, present that evidence to the Commission and the Traceback Consortium.
5. Within fourteen (14) days of the date of this letter (November 5, 2021), inform the Commission and the Traceback Consortium of the steps PZ/Illum is taking to prevent customers from using its network to transmit illegal robocalls (i.e. robocall mitigation measures).⁵ Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.⁶

Consequences for Failure to Comply. If after 48 hours of issuance of this letter PZ/Illum continues to route or transmit illegal robocall traffic from the entities involved in these campaigns, downstream U.S.-based voice service providers may begin blocking all calls from PZ/Illum after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.⁷ If PZ/Illum fails to take sufficient mitigating actions to prevent new and renewing

⁴ See 47 U.S.C. § 227(b); 47 CFR § 64.1200(a).

⁵ See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7630, para. 43 (2020) (*Call Blocking Safe Harbor Report and Order*).

⁶ You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

⁷ In July 2020, the Commission adopted the *Call Blocking Safe Harbor Report and Order*, which authorized voice service providers to block illegal robocalls. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628, para. 37; see also 47 CFR § 64.1200(k)(3)-(4). If the Commission identifies illegal traffic, based on information obtained through traceback such as that provided by the Traceback Consortium, the Commission may notify the voice service provider that it is transmitting identified probable illegal calls (or “bad traffic”) and, upon receipt of notification, the voice service provider should investigate promptly and take any steps that may be necessary to prevent the illegal caller from continuing to use the network to make such calls. Furthermore, if the notified voice service provider fails to take effective mitigation measures within 48 hours, any downstream voice service provider may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628-

customers from using its network to originate illegal robocalls, then downstream U.S.-based providers may block calls following notice to the Commission. **Failure to act within the deadlines authorizes U.S.-based voice service providers to block ALL call traffic transmitting from your network, permanently.**

Furthermore, if you fail to take the actions listed above, or knowingly or negligently continue to originate unlawful robocall campaigns after responding to this letter, we may find that your certification in the Robocall Mitigation Database is deficient and direct the removal of your certification from the database.⁸ Removal of a certification from the Robocall Mitigation Database requires all intermediate providers and terminating voice service providers to immediately cease accepting all of your calls.⁹ **Continued origination of illegal robocalls following this notice will be used as evidence of a defective certification, and we may initiate proceedings to remove your certification from the Robocall Mitigation Database.**¹⁰ You will have an opportunity to respond to that notice.¹¹

Please direct any inquiries or responses regarding this letter to Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at daniel.stepanicich@fcc.gov or (202) 418-7451; and cc: to Kristi Thompson, Division Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC, at kristi.thompson@fcc.gov. A copy of this letter has been sent to the Traceback Consortium.

Sincerely,



Rosemary C. Harold
Chief
Enforcement Bureau
Federal Communications Commission

29, para. 39. Any voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 42; 47 CFR § 64.1200(k)(4). If the notified voice service provider fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls, other downstream voice service providers may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7630 para. 43; 47 CFR § 64.1200(k)(3)-(4). A voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 43; 47 CFR § 64.1200(k)(4).

⁸ See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1905, para. 88; see also Robocall Mitigation Database, FCC, available at https://fccprod.servicenowservices.com/rmd?id=rmd_welcome (last visited Oct. 19, 2021)

⁹ 47 CFR § 64.6305(c). See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1904, para. 86; *Wireline Competition Bureau Announces Opening of Robocall Mitigation Database and Provides Filing Instructions and Deadlines*, WC Docket No. 17-97, Public Notice, DA 21-454 (WCB Apr. 20, 2021).

¹⁰ See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1902, 1905, paras. 81, 88.

¹¹ *Id.* at 1905, para. 88.

ATTACHMENT A

Customer	Date of ITG Notification	Date of Call	Caller ID	Called Number	Description	Violation
No Response	Aug 25, 2021 17:43 Aug 30, 2021 14:00	Aug 24, 2021 20:05 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Aug 25, 2021 19:44 Aug 30, 2021 14:00	Aug 24, 2021 19:56 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Aug 30, 2021 14:00	Aug 24, 2021 19:49 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Aug 30, 2021 14:00	Aug 24, 2021 19:42 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Aug 30, 2021 14:21	Aug 24, 2021 19:38 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Aug 26, 2021 15:26	Aug 24, 2021 19:38 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Aug 27, 2021 14:20 Aug 26, 2021 15:00 Aug 26, 2021 14:46	Aug 23, 2021 14:12 UTC			CBP-Govt Imposter	47 USC 227(b); 47 CFR 64.1200(a)

Edoro Technologies	Sep 01, 2021 13:22	Aug 31, 2021 16:41 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 01, 2021 13:25	Aug 31, 2021 16:37 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 01, 2021 14:07	Aug 31, 2021 15:48 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 01, 2021 15:41	Aug 31, 2021 15:46 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 01, 2021 14:02	Aug 31, 2021 14:21 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 01, 2021 15:48	Aug 31, 2021 13:22 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Q2Serves	Sep 07, 2021 17:36	Sep 03, 2021 13:48 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 14, 2021 12:10	Sep 07, 2021 21:11 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 14, 2021 14:00	Sep 07, 2021 20:59 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)

Spinning Mantra Communications Pvt. Ltd.	Sep 08, 2021 16:39	Sep 07, 2021 19:12 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd	Sep 08, 2021 18:01	Sep 07, 2021 17:27 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 08, 2021 18:00	Sep 07, 2021 17:18 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 08, 2021 15:05	Sep 07, 2021 16:20 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 08, 2021 15:30	Sep 07, 2021 16:01 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 14, 2021 14:00 Sep 08, 2021 16:06	Sep 07, 2021 15:49 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 14, 2021 12:07	Sep 07, 2021 15:13 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Spinning Mantra Communications Pvt. Ltd.	Sep 14, 2021 14:00	Sep 07, 2021 15:02 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Sep 08, 2021 16:13	Sep 03, 2021 14:32 UTC			CBP-Govt Imposter	47 USC 227(b); 47 CFR 64.1200(a)

Cyber Futuristics Pvt. Ltd.	Sep 08, 2021 16:50 Sep 08, 2021 15:45	Sep 02, 2021 17:25 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Cyber Futuristics Pvt. Ltd.	Sep 14, 2021 12:08	Sep 02, 2021 15:28 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Edoro Technologies	Sep 14, 2021 14:00 Sep 08, 2021 21:33	Sep 01, 2021 17:24 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Iqbri Telecom Pvt. Ltd.	Sep 13, 2021 15:50	Sep 09, 2021 16:54 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Iqbri Telecom Pvt. Ltd.	Sep 10, 2021 17:48	Sep 09, 2021 17:15 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Iqbri Telecom Pvt. Ltd.	Sep 10, 2021 15:51	Sep 09, 2021 18:06 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Iqbri Telecom Pvt. Ltd.	Sep 10, 2021 15:47	Sep 09, 2021 14:06 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Globalite Collaboration Pvt. Ltd.	Sep 08, 2021 17:15	Sep 08, 2021 17:15 UTC			Federal Reserve Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Globalite Collaboration Pvt. Ltd.	Sep 10, 2021 17:52	Sep 08, 2021 16:56 UTC			Federal Reserve Imposter	47 USC 227(b); 47 CFR 64.1200(a)

No Response	Sep 14, 2021 12:54	Sep 13, 2021 14:43 UTC			Arrest Warrant	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 20, 2021 18:59	Sep 13, 2021 16:46 UTC			Arrest Warrant	47 USC 227(b); 47 CFR 64.1200(a)
Iqbri Telecom Pvt. Ltd.	Sep 14, 2021 18:57 Sep 14, 2021 19:26	Sep 13, 2021 16:34 UTC			Arrest Warrant	47 USC 227(b); 47 CFR 64.1200(a)
Q2Serves	Sep 21, 2021 14:00	Sep 15, 2021 16:57 UTC			Utility Disconnect Sam	47 USC 227(b); 47 CFR 64.1200(a)
Cyber Futuristics Pvt. Ltd.	Sep 17, 2021 05:20	Sep 14, 2021 14:34 UTC			CBP-Govt Imposter	47 USC 227(b); 47 CFR 64.1200(a)
AARV Services Pvt. Ltd.	Sep 17, 2021 13:32	Sep 16, 2021 15:23 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Sep 17, 2021 13:32	Sep 16, 2021 19:26 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Sep 17, 2021 14:16	Sep 16, 2021 19:18 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
AARV Services Pvt. Ltd.	Sep 20, 2021 15:24	Sep 16, 2021 17:44 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)

No Response	Sep 17, 2021 13:32	Sep 16, 2021 22:32 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
No Response	Sep 17, 2021 17:50	Sep 16, 2021 21:23 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Cyber Futuristics Pvt. Ltd.	Sep 20, 2021 15:57 Sep 21, 2021 13:56	Sep 02, 2021 15:20 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 20, 2021 18:53	Sep 15, 2021 15:11 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 23, 2021 14:00	Sep 15, 2021 17:54 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 21, 2021 16:56 Sep 20, 2021 20:47	Sep 15, 2021 20:29 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Coequence	Sep 20, 2021 18:57	Sep 15, 2021 21:59 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sept 20, 2021 20:43	Sep 15, 2021 16:17 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Coequence	Sep 20, 2021 19:01	Sep 15, 2021 21:05 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)

Coequence	Sep 20, 2021 19:03	Sep 15, 2021 22:15 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Go4Customer	Sep 21, 2021 15:29	Sep 20, 2021 19:53 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 21, 2021 15:29	Sep 20, 2021 18:39 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
Go4Customer / CyFuture	Sep 21, 2021 16:02	Sep 20, 2021 15:11 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
RD INFOTECH	Sep 23, 2021 12:26 Sep 23, 2021 13:09	Sep 20, 2021 20:09 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
SAGA	Sep 30, 2021 20:13 Sep 30, 2021 22:23	Sep 28, 2021 21:46 UTC			Credit Card Rate Reduction Call	47 USC 227(b); 47 CFR 64.1200(a)
SAGA	Oct 07, 2021 18:34	Sep 28, 2021 21:26 UTC			Credit Card Rate Reduction Call	47 USC 227(b); 47 CFR 64.1200(a)
SAGA	Sept 30, 2021 19:25	Sep 28, 2021 18:29 UTC			Credit Card Rate Reduction Call	47 USC 227(b); 47 CFR 64.1200(a)
SAGA	Oct 01, 2021 01:09	Sep 29, 2021 15:28 UTC			Credit Card Rate Reduction Call	47 USC 227(b); 47 CFR 64.1200(a)

Max Solutions	Oct 05, 2021 12:49	Oct 04, 2021 22:58 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Max Solutions	Oct 05, 2021 13:57	Oct 04, 2021 22:19 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Max Solutions	Oct 05, 2021 13:23	Oct 04, 2021 20:09 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Max Solutions	Oct 05, 2021 13:20	Oct 04, 2021 19:13 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Max Solutions	Oct 06, 2021 14:15	Oct 04, 2021 18:30 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
Max Solutions	Oct 05, 2021 12:44	Oct 04, 2021 19:07 UTC			SSA Imposter	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 19, 2021 14:00	Oct 12, 2021 19:57 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 15:55	Oct 12, 2021 19:25 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 14, 2021 00:21	Oct 12, 2021 19:24 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)

LINTECH SOLUTIONS	Oct 13, 2021 16:54	Oct 12, 2021 19:05 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 18:10	Oct 12, 2021 19:47 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 18:43	Oct 12, 2021 19:41 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 20:55 Oct 13, 2021 20:40	Oct 12, 2021 19:37 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 17:32	Oct 12, 2021 19:35 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 16:57	Oct 12, 2021 21:27 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 13, 2021 17:41	Oct 12, 2021 21:01 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)
LINTECH SOLUTIONS	Oct 15, 2021 14:08	Oct 13, 2021 16:49 UTC			Arrest Warrant Scam	47 USC 227(b); 47 CFR 64.1200(a)